



March 4, 2013

Marlene H. Dortch, Secretary,
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation – Facilitating the Deployment of Text-to-911 and Other
Next Generation 911 Applications, PS Docket No. 11-153, and Framework for Next
Generation 911 Deployment, PS Docket No 10-255

Dear Ms. Dortch:

On February 28, 2013, I and Joy Grewatz of Capital Edge met with David Turetsky, David Furth and Timothy May of the Public Safety and Homeland Security Bureau of the Federal Communications Commission to discuss the legal and statutory framework for Next Generation 9-1-1 Services pursuant to the Next Generation 9-1-1 Advancement Act of 2012. Attached please find the letter dated February 28, 2013 which was presented to the participants and summarizes the oral presentations. Please feel free to contact me should you have any questions.

Sincerely,

Don Crowson
Fire Chief / Director of Emergency Management
Arlington Fire Department
Arlington, Texas
P.O. Box 90231 MS 04-260
&
Tarrant County 911 Board Member
Don.Crowson@arlingtontx.gov

TARRANT COUNTY 9-1-1

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February 28, 2013

David Furth
Deputy Bureau Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Legal and Statutory Framework for Next Generation 9-1-1 Services pursuant to the Next Generation 9-1-1 Advancement Act of 2012, Docket No. 12-333

Chief Furth:

The Tarrant County 9-1-1 District Board of Managers represents approximately 2.2 million citizens residing in 41 cities and/or member entities in North Texas by providing 9-1-1 service through 32 Public Safety Answering Points (PSAPs), 6 secondary PSAPs, 11 backup PSAPs and 2 training PSAP locations.

The Tarrant County 9-1-1 District facilitated approximately 2.2 million 9-1-1 calls in 2012.

The Tarrant County 9-1-1 Board appreciates the opportunity to submit comments on facilitating the deployment of texting to 9-1-1 during emergencies. We are encouraged by the Commission's commitment to thoroughly studying Next Generation 9-1-1 (NG9-1-1) services as well as the ability to deploy text to 9-1-1 services

The District's PSAPs Telecommunicators are trained to handle all types of emergencies requiring a police, fire or medical response. Every PSAP is equipped with TDD (Telecommunications Device for the Deaf) equipment and our call takers are trained in accordance with national standards on procedures for processing calls from hearing impaired callers who are using either a TDD device or a relay service.

Text to 911 misconceptions

A misconception among our citizens is that texting capabilities to 9-1-1 are currently available. The general public is typically not aware of the limitations on texting for emergencies and does not recognize the enormous complexity of deploying this service in an emergency dispatch center. The call processing equipment and computer aided dispatch system currently installed in the District's PSAP dispatch centers are incompatible with the text, chat, and streaming video functions and features of cellular communication devices. We recognize the importance of the ability to text 9-1-1 as a viable form of communication for reporting emergencies; however, there are several limitations that must be addressed prior to deployment.

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Mandatory requirements for text-to-9-1-1 would present several formidable technical and operational concerns. Unlike TTY/TDD usage, currently there is not an official guide to texting. Misinterpretation of text messages could lead to longer processing times and/or error. A text conversation would generally take longer to process than a voice conversation with the same amount of information as delivery times of text messages can vary from seconds to minutes, which means there could be significant delays in message delivery. Text messages do not support real-time communications with Public Safety Answering Points (PSAPs) and the time it takes for a text message to be composed, transmitted, and received by a 9-1-1 dispatch center could greatly impact the outcome in an emergency situation.

Texting back and forth is more time consuming than a real-time conversation with a caller. Short message systems (SMS) lack the ability to pinpoint a user's location and the transmission of SMS messages can be unreliable or delayed. In addition, an increased text volume would limit the capabilities of dispatcher centers to efficiently respond to every emergency. When it comes to emergencies, voice still remains the optimal method of calling for help.

Although several brief text-to-9-1-1 trials have occurred, most PSAPs in the nation will not be equipped to handle texts to their E9-1-1 systems for an extended period of time. Deploying and implementing systems that are able to accommodate the ability to text-to-9-1-1 in major metropolitan areas would be extremely challenging and expensive. Migration of the PSAP's current E9-1-1 system that handles voice-only calls to an IP-based, NG9-1-1 architecture with text and video messaging capabilities would cost cities millions of dollars in updated technology infrastructure and lead to increased user fees. While new wireless and IP-based communications devices are being rapidly developed, financing of new infrastructure and upgrades has been unable to keep pace. Without federal funding, the City would be hard pressed to financially support the initial deployment and continual upgrades of infrastructure, 9-1-1 call processing equipment and dispatch systems capable of handling the latest, ever changing trends in cellular technology.

With the rapid evolution of technology and growing number of mobile users, the technology capabilities needed to provide public safety have changed. The Tarrant County 911 Board is committed to the technological advancement, availability, accessibility and implementation of a reliable emergency assistance system. The transition from E9-1-1 to a NG9-1-1 emergency response system will have far-reaching operational impacts cities in the Tarrant County 9-1-1 district and other cities across the nation. Stakeholders, including local officials must be included in the discussion process as the Commission develops the framework and guidelines for the technical structure and capabilities of an NG9-1-1 system. It is also important to recognize that federal or other type of predetermined funding is paramount to successful implementation and management of NG9-1-1 systems.

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Below are our fundamental issues of concern:

- **Belief that text to 9-1-1 is already here** – Because of the marketing by the telecommunication industry, a large percentage of the public believes that text to 9-1-1 services is currently available. While advances in technology often represent an opportunity to improve a service, the cost of delivery is a major concern to local jurisdictions. Because something can be done, doesn't mean it should be done, especially when there are so many unanswered implementation issues and no clear answer as to how this effort will be sufficiently funded.
 - **Bounce Back Messaging will create an unrealistic citizen expectation** – Without a guaranteed funding mechanism and national standard to support this type of service, the presence of a return message will stimulate expectations that local communities will not be able to afford nor deliver.
- **Simplicity of existing 9-1-1 service** – The success of today's 9-1-1 service can be largely attributed to the simplicity of operation between the caller using the 9-1-1 system and the PSAP receiving the call. Call 911 - someone answers the phone, and a responding resource is sent based on information received. The Text to 9-1-1 concept adds multiple **complicating factors** for emergency call center personnel for which no funding solutions or national guidelines currently exist.
 - **System Cost**
 - The additional infrastructure, software, and personnel costs, as well as the training for 9-1-1 personnel, will increase dramatically. Who will pay for these additional costs?
 - **Standardization of Operations for Text to 9-1-1**
 - What is the national standard for texting to 9-1-1? How will the general public be held to a standard? What about the misinterpretation of text messages, the use of languages other than English, the use of abbreviated terms not known to the 9-1-1 receiver, the concern regarding the speed of interaction between text initiator and text receiver and many other unanswered issues that could result in drastic consequences? In emergency call operations, the more clear and definitive the operating process is - the less the chance there is for failure.

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- **Training**

- New technologies will create a need for additional training for existing and new Telecommunicators. Additional training should not only be limited to the technology aspect but should also encompass the human aspect as emergency call personnel will be at risk of having to view violent crimes via streaming video and pictures. How will this be funded?

- **Additional Staff**

- The volume associated with text to 9-1-1 service will likely double or triple the volume of calls to local PSAPs and thus require additional personnel to deal with the increased demand – How with this be funded?

The Tarrant County 9-1-1 District Board of Managers appreciates the opportunity to provide input on facilitating the deployment of texting to 9-1-1 and developing the framework for Next Generation 9-1-1 services. We ask for careful consideration before an expectation of service is created by the federal government for which local municipal entities will obligated to provide.

We look forward to working with the Federal Communications Commission and other state and local partners to ensure the success of this historic opportunity.

Sincerely,



Larry Boyd
Chairman, Board of Managers
Police Chief City of Irving
Tarrant County 9-1-1 District
Tarrant County, Texas

Rick Brunson
Vice Chair
Support Services Manager
Tarrant County Commissioner's
Court Appointee

Richard Fregoe
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Deputy Mayor Pro Tem
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Sam Grief
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